

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARED MICHAEL DIEHL,

Defendant.

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Cause No. 4:22-CR-00055 RLW/PLC

**DEFENDANT'S FIRST MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS**

Comes now Counsel for Defendant, Jared M. Diehl and respectfully requests a sixty-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography.
2. Defense Counsel needs additional time to investigate and research this case.
3. Based on the nature of the discovery in this case counsel must review some these items at the United States Attorneys Office. Counsel has been working with the Government to review the evidence; however, the Government investigators are still completing their review which is nearly completed. Once this is done Counsel will be able to review everything. Counsel believes based on representations made by the Government that he will be able to review some of the technical evidence in the next few weeks.
4. The parties have also started to engage in preliminary plea negotiations which may alleviate the need for pretrial motions. More time is needed to complete these negotiations.
5. A trial date has not been set for the cause.

6. The Government has no objection to this request for an extension per Assistant United States Attorney Jillian Anderson.

7. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a sixty-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By /s/ Joseph W. Flees
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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Joseph W. Flees
JOSEPH W. FLEES